

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: CORA LONG

CHAPTER 13

DEBTOR

CASE NO. 18-13981-JDW

MOTION TO EXTEND AUTOMATIC STAY

COMES NOW, Debtor, by and through her attorney of record, Robert H Lomenick, and moves this Court for an Order extending the automatic stay provided under Section 362(a) of the U.S. Bankruptcy Code as to all creditors. In support of said Motion the Debtor would show unto the court the following:

1. Debtor filed a petition under Chapter 13 of the U.S. Bankruptcy Code on October 11, 2018.
2. Debtor had previously been a debtor in a Chapter 13 case filed in the Northern District of Mississippi on May 5, 2016, and docketed as Case No. 16-11580-JDW. That prior case was dismissed for failure to timely remit plan payments.
3. Debtor is facing foreclosure of her home and is therefore in need of an Order of this Court continuing the automatic stay beyond the expiration of the thirty (30) day period specified in said Code Section.
5. The filing of the present case and plan is in good faith, and continuation of the stay in regard to the foreclosure proceeding and all creditors is necessary for an effective reorganization by the Debtor. The Debtor believes that the Chapter 13 Plan will be confirmed, and that she will be able to fully perform under the terms of the Plan.

WHEREFORE, the Debtor respectfully prays for the following:

1. That the Court extend the automatic stay under Section 362(a) of the U.S. Bankruptcy Code as to all creditors for the duration of this Chapter 13 proceeding or

until such time as the stay is terminated under Section 362(c)(1) or (c)(2) or a motion for relief is granted under Section 362(d).

2. That the Court grant such other and further relief as it deem just and proper.

DATED: October 12, 2018

Respectfully submitted,

/s/ Robert H Lomenick
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CERTIFICATE OF SERVICE

I, Karen B. Schneller/Robert H. Lomenick, attorney for debtor(s), do hereby certify that I have this day mailed a true and correct copy by United States Mail, postage prepaid, of the above and foregoing Motion to Extend Automatic Stay to the case Trustee, the U.S. Trustee, and to all creditors listed on the master mailing list (matrix).

THIS, the 12th day of October, 2018

/s/Robert H Lomenick
ATTORNEY FOR DEBTOR(S)